

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: THERESA MASON	:	CHAPTER 13
TERRANCE MASON	:	
DEBTOR	:	CASE NO. 17-14854 ELF

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**DEBTOR'S ANSWER TO  
MOTION FOR RELIEF FROM STAY**

**1. -2. Admitted.**

**3. Denied. Debtors deny that movant is the proper assignee of such mortgage. Strict proof demanded.**

**4. Admitted.**

**5. Denied. Debtor, due to lack of personal knowledge, denies that movant has standing and or is the owner of the alleged debt, denies that movant has the Note and denies that JPMORGAN CHASE is the servicer.**

**6. Denied. Debtors have no knowledge of any foreclosure.**

**7. Denied. The plan speaks for itself.**

**8. Denied. Debtors have made some of the payments. Strict proof demanded.**

**9. Denied.**

**10. Denied. Movant has adequate protection. Debtor's equity is not inconsequential**  
**No cause exists for relief from the stay.**

**11. Denied as a request for declaratory relief.**

**WHEREFORE, Debtors request your honorable court to deny the said Motion.**

Respectfully submitted,

/s/ Joseph F. Claffy  
Joseph F. Claffy, Esquire  
Attorney for Debtors